

EXHIBIT H

REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO
TRUCKING LLC,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEO DEPOSITION OF DANIEL GRUVER

San Francisco, California

Friday, August 4, 2017

Volume II

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2671821

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05:27

1 to.

2 Q. Is this reference to the Fuji project?

3 A. I believe this is actually reference to
4 facility layout, but I could be wrong.

5 MR. JAFFE: Let's mark as Exhibit 523 a
6 document that is titled "July 19th, 2017,
7 Supplemental Log Pursuant to Orders on Motion for
8 Preliminary Relief and Special Master's Protocol."

9 (Exhibit 523 was marked for
10 identification by the court reporter and is
11 attached hereto.)

05:29

12 Q. (By Mr. Jaffe) Mr. Gruver, have you seen
13 Exhibit 523 before?

14 A. I have not.

15 Q. All right. What I would like you to do
16 is go to -- let's start at line 76.

05:29

17 A. Yes.

18 Q. Do you see there's entry dated 2/11/2016?

19 A. Uh-huh.

20 Q. And it says a "Conversation regarding
21 LiDAR design tools and techniques."

05:30

22 A. Yes.

23 Q. What did you and Mr. Levandowski discuss
24 on February 11th, 2016, about LiDAR design?

25 A. I don't recall.

05:30

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1 Q. All right. 05:30

2 A. I mean, from here, it appears we
3 discussed tools and techniques.

4 Q. Right. But one of the entries in here
5 says "LiDAR design." 05:30

6 Do you see that?

7 A. Yeah.

8 Q. What did you talk about regarding LiDAR
9 design?

10 A. I don't recall. 05:30

11 Q. Okay. Can you go to entry 206.

12 A. Yeah. Yes.

13 Q. It references "Weekly LiDAR standup" here
14 at entry 206?

15 A. Yes. 05:31

16 Q. And it lists you as the author?

17 A. Yes.

18 Q. And it lists Anthony Levandowski as a
19 recipient.

20 A. Yes. 05:31

21 Q. What do you -- what did
22 Anthony Levandowski and you and others discuss
23 about LiDAR at this weekly standup?

24 A. This was a weekly meeting to go over sort
25 of tasks that engineers were working on and things 05:31

1 to -- I guess so we have a weekly LiDAR meeting 05:32
2 about what engineers are working on, what the goals
3 for the week or sort of the two or three next weeks
4 are, and if engineers need help or support from
5 other engineers or other parts of the team. 05:32

6 Q. Did Mr. Levandowski provide feedback at
7 this meeting?

8 A. I don't recall.

9 Q. If you can go to 269.

10 A. Yes. 05:32

11 Q. There's another meeting invite from
12 Mr. Levandowski --

13 A. Uh-huh.

14 Q. -- dated June 9th, 2016?

15 A. Yes. 05:32

16 Q. What was Mr. Levandowski's contribution
17 to that meeting?

18 A. I don't recall.

19 Q. And looking at 272 and 273, do you
20 remember those discussions? 05:33

21 A. No.

22 Q. All right. What about 277?

23 A. I don't know the specific context of that
24 meeting.

25 Q. Okay. What did Anthony Levandowski 05:33

1 contribute to that meeting? 05:33

2 A. For 277?

3 Q. Yes.

4 A. I don't specifically.

5 Q. Do you know anything? 05:34

6 A. I don't recall what specifically we
7 talked about on June 13th or what he would have
8 contributed to that meeting.

9 Q. Can you tell me any LiDAR-related
10 information that Anthony Levandowski contributed or 05:34
11 did not contribute at the meeting here in -- was it
12 279?

13 A. 279.

14 Q. Oh, excuse me, there's two of them on
15 here. 277. 05:34

16 A. No. I don't recall what his involvement
17 would have been in that meeting.

18 Q. Okay. Same question for 279. Can you
19 tell me any of the information that Mr. Levandowski
20 provided in this meeting that's line 279. 05:34

21 A. I don't know what he provided.

22 Q. Okay. Let's go to 299.

23 A. Yes.

24 Q. It's another meeting, LiDAR meeting, with
25 Mr. Levandowski. 05:34

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1 A. Yes. Same LiDAR standup. 05:34

2 Q. And what information did Mr. Levandowski
3 provide in that meeting?

4 A. I don't recall.

5 Q. All right. Let's go to 363. 05:35

6 Do you see there's another meeting?

7 A. LiDAR standup meeting.

8 Q. Okay. For this one on -- on --

9 A. July 21st.

10 Q. -- July 21st, what information did 05:35

11 Mr. Levandowski provide in this meeting about

12 LiDAR?

13 A. I don't recall.

14 Q. 376, another LiDAR meeting dated

15 August 4th. 05:35

16 Do you see that?

17 A. I do.

18 Q. What information did Mr. Levandowski

19 provide in that meeting?

20 A. I don't recall. 05:35

21 Q. Let's go to 405. Do you remember what
22 information Anthony Levandowski provided about
23 LiDAR at this meeting that's entry 405?

24 A. No. I believe we were -- from what I
25 recall of this meeting, we were learning about the 05:36

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1 capability of their system. 05:36

2 Q. All right. 463, another LiDAR standup
3 meeting, this one dated September 15th, 2016.

4 Do you recall what information
5 Anthony Levandowski provided at this meeting that's 05:36
6 entry 463?

7 A. I do not recall what information he --
8 if -- what or if he provided information at this
9 meeting.

10 Q. Same question for Entry No. 491, 05:36
11 another -- another LiDAR meeting.

12 A. 491. LiDAR standup meeting.

13 Q. What information did Anthony Levandowski
14 provide at the meeting that's entry 491?

15 A. I don't recall what, if any, information 05:37
16 Anthony provided in the meeting 491.

17 Q. All right. Same question for the meeting
18 that's No. 500.

19 A. Number 500, LiDAR standup meeting. I
20 don't recall what, if any, information Anthony 05:37
21 provided in item 500.

22 Q. Okay. And then what about entry 526?

23 A. 526, Declined calendar invite LiDAR
24 Monday standup meeting, 10/24.

25 I don't recall this meeting. 05:37

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1 Q. Okay. We march on. 534. 05:37

2 A. 534, LiDAR standup meeting -- sorry
3 what's the question?

4 Q. Do you recall any information that
5 Anthony Levandowski provided at the meeting 05:38
6 described in entry 534?

7 A. I don't recall what, if any, information
8 Anthony provided in line item 534.

9 Q. Okay. The same question for entry 539.
10 What information did Anthony Levandowski provide? 05:38

11 A. 539, LiDAR standup meeting. I don't
12 recall what, if any, information Anthony provided
13 in that meeting.

14 Q. 540, what information did
15 Anthony Levandowski provide in this LiDAR meeting 05:38
16 on -- on October 28th, 2016?

17 A. 540 is LiDAR standup meeting. I --
18 October 28th, I don't recall what, if any,
19 information Anthony provided in line item 540.

20 Q. Line 541, what information did 05:39
21 Anthony Levandowski provide about another meeting,
22 apparently, on October 28th, 2016?

23 A. I believe that is a duplicate, given that
24 it is -- so line 540 and line 541, to my
25 observation, occur on the same date, scheduled at 05:39

1 the same time. 05:39

2 So I will say that my answer for 541
3 would be the same as line 540, that I don't recall
4 what, if any, information Anthony provided to the
5 meeting on 541. 05:39

6 Q. And then looking at 542 and 543, do you
7 have any opinion whether those are duplicates?

8 A. LiDAR standup meeting -- those appear to
9 be, yeah, both duplicates of 540 and 541.

10 Q. 550 -- 05:39

11 A. 550.

12 Q. -- this is November 3rd, hat, if
13 any, information did Anthony Levand ovide
14 about LiDAR?

15 A. Meeting with third-party [REDACTED] at 05:40
16 7:00 p.m.

17 I believe 550 was an initial meeting with
18 [REDACTED] which is a third-party LiDAR vendor, to
19 gain information about capabilities of their system
20 and its possible use to aid our self-driving car 05:40
21 program.

22 Q. Okay. Let's go to -- well, did -- did
23 Anthony disclose any design feedback or LiDAR
24 design techniques at that meeting?

25 A. I don't recall him disclosing any design 05:40

1 feedback or LiDAR techniques in that meeting. 05:40

2 Q. Okay. Let's go to 588.

3 A. 588, laser MVP and milestones meeting.

4 Q. And why don't we just group these all
5 together if it's -- if it works for you, 588 05:41
6 through 596.

7 A. Yes. Yes.

8 Q. Do you have any information, sitting here
9 today, on what information, if any,
10 Anthony Levandowski communicated about LiDAR design 05:41
11 in entries 588 through 596?

12 A. No. I do not recall what Anthony's
13 contribution to the collection of the same meeting
14 described in 588 to 596 was.

15 Q. 633? 05:41

16 A. Declined calendar invite for weekly LiDAR
17 Monday standup meeting 11:00 a.m.

18 I don't recall what the -- what
19 contribution, if any, Anthony provided to the
20 declined calendar invite for weekly LiDAR Monday 05:42
21 standup meeting at 11:00 a.m. on line 533 [sic] is.

22 Q. 660, there's a meeting January 5th, 2017?

23 A. 660, January 5th. This is Declined
24 calendar invite for 1/15 -- 1/5/17 Fuji test matrix
25 review meeting at 2:00 p.m. 05:42